

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:
Case No. 18-op-45090

THE COUNTY OF SUMMIT, OHIO and
THE CITY OF AKRON,

Plaintiffs,

vs.

PURDUE PHARMA, L.P. et al.,

Defendants.

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DEFENDANT ANDA, INC.'S ANSWER
TO CORRECTED SECOND AMENDED
COMPLAINT AND JURY DEMAND**

Defendant Anda, Inc. (“Anda”) hereby answers Plaintiffs The County of Summit Ohio and The City of Akron, Ohio’s (together, “Plaintiffs”) Corrected Second Amended Complaint (“CSAC”) as follows:

PRELIMINARY STATEMENT

Though the CSAC purports to be directed to Anda, Inc., it improperly refers to “Defendants” (presumably meaning other, unrelated pharmaceutical companies named in the CSAC), and/or third parties on a collective basis, failing to plead with requisite particularity the allegations against Anda individual. This is insufficient to apprise Anda of the allegations asserted against it and conduct, statements, documents, or other information attributed to Defendants on a collective basis. Anda nevertheless has endeavored to respond to Plaintiffs’ allegations to the extent possible.

To the extent the CSAC’s allegations refer to the knowledge, conduct, or actions of other persons or entities, Anda is generally without knowledge or information sufficient to form a belief as to the truth of those allegations and, on that basis, generally and specifically denies all such allegations. Anda states that it is answering Plaintiffs’ allegations solely on behalf of itself, even when the allegations collectively refer to alleged conduct by Defendants and other persons or entities.

The CSAC also contains purported quotations from a number of sources, some of which are unidentified. In answering allegations consisting of quoted or paraphrased language, Anda’s failure to specifically deny that the language quoted or paraphrased was contained in a document or uttered by the person or entity to which it is attributed, or Anda’s reference to the full document instead of the quoted or paraphrased language shall not constitute an admission that the substantive content of the source(s) quoted or paraphrased is or is not true, or that the material is relevant or admissible in this action.

Anda denies each and every allegation contained in the CSAC, except as specifically admitted herein, and any factual allegation admitted herein is admitted only as to the specific facts alleged and not as to any conclusions, characterizations, implications, innuendos, or speculation contained in any allegation or in the CSAC as a whole. Moreover, Anda specifically denies any allegations contained in headings, footnotes, or unnumbered paragraphs in the CSAC.

These comments and objections are incorporated, to the extent appropriate, into each numbered paragraph of this Answer.

ANSWER

And now answering the allegations and averments of the CSAC paragraph by paragraph, Anda states as follows:

1. Paragraph 1 purports to be a characterization of Plaintiffs' claims and consists of statements of opinion rather than facts and accordingly requires no response by Anda; to the extent a response is required, denied. To the extent the allegations contained in paragraph 1 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

INTRODUCTION

2. Paragraph 2 purports to be a characterization of Plaintiffs' claims and consists of statements of opinion rather than facts and accordingly requires no response by Anda; to the extent a response is required, denied. To the extent the allegations contained in paragraph 2 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

3. To the extent the allegations contained in paragraph 3 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 3 that pertains to Anda.

4. The allegations contained in paragraph 4 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

5. The allegations contained in paragraph 5 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

6. The allegations contained in paragraph 6 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

7. The allegations contained in paragraph 7 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

8. The allegations contained in paragraph 8 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

9. Paragraph 9 purports to be a characterization of Plaintiffs' claims and consists of statements of opinion rather than facts and accordingly requires no response by Anda; to the extent a response is required, denied. To the extent the allegations contained in paragraph 9 refer to the

knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

10. The allegations contained in paragraph 10 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

11. The allegations contained in paragraph 11 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

12. The allegations contained in paragraph 12 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

13. The allegations contained in paragraph 13 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

14. To the extent the allegations contained in paragraph 14 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 14 that pertains to Anda.

15. The allegations contained in paragraph 15 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

16. The allegations contained in paragraph 16 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

17. To the extent the allegations contained in paragraph 17 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 17 that pertains to Anda.

18. To the extent the allegations contained in paragraph 18 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 18 that pertains to Anda.

19. To the extent the allegations contained in paragraph 19 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 19 that pertains to Anda.

20. To the extent the allegations contained in paragraph 20 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 20 that pertains to Anda.

21. To the extent the allegations contained in paragraph 21 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 21 that pertains to Anda.

22. To the extent the allegations contained in paragraph 22 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 22 that pertains to Anda.

23. The allegations contained in paragraph 23 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

24. To the extent the allegations contained in paragraph 24 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 24 that pertains to Anda.

JURISDICTION AND VENUE

25-27. The allegations contained in paragraphs 25-27 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraphs 25-27 that pertain to Anda.

PARTIES

I. PLAINTIFFS

28-57. The allegations contained in paragraph 28-57 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

58. To the extent the allegations contained in paragraph 58 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 58 that pertains to Anda.

59. To the extent the allegations contained in paragraph 59 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 59 that pertains to Anda.

60. To the extent the allegations contained in paragraph 60 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 60 that pertains to Anda.

61. The allegations contained in paragraph 61 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraphs 61 that pertain to Anda.

62. The allegations contained in paragraph 62 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all allegations contained in paragraph 62 that pertain to Anda.

II. DEFENDANTS

63-106. The allegations contained in paragraphs 63-106 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

107. To the extent the allegations contained in paragraph 107 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that Anda is a wholesale distributor of, among other things, prescription opioids in the United States. Anda denies each and every remaining allegation contained in paragraph 107 that pertains to Anda.

108. The allegations contained in paragraphs 108 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

109. Anda admits that it is a distributor of, among other things, prescription opioids in the United States and, during the time period at issue, within the State of Ohio. Anda further admits that it is licensed by the DEA and each of the fifty states to distribute controlled substances to licensed customers. Anda admits that it is a Florida corporation with its principal place of business in Weston, Florida and that it is registered to do business in the State of Ohio. Anda admits that in October 2016, it was acquired by Teva Pharmaceuticals USA, Inc. from Allergan plc for \$500 million. Anda denies each and every remaining allegation contained in paragraph 109 that pertains to Anda.

110-128. The allegations contained in paragraphs 110-128 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

129. To the extent the allegations contained in paragraph 129 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 129 that pertains to Anda.

FACTUAL ALLEGATIONS

I. FACTS COMMON TO ALL CLAIMS

130. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 130 and, therefore, denies them.

131. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 131 and, therefore, denies them.

132-170. The allegations contained in paragraphs 132-170 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

171. To the extent the allegations contained in paragraph 171 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 171 that pertains to Anda.

172. To the extent the allegations contained in paragraph 172 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 172 that pertains to Anda.

173. To the extent the allegations contained in paragraph 173 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 173 that pertains to Anda.

174-497. The allegations contained in paragraphs 174-497 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

498. To the extent the allegations contained in paragraph 498 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 498 that pertains to Anda.

499. To the extent the allegations contained in paragraph 499 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 499 that pertains to Anda.

500. Admitted.

487 [sic]. The allegations contained in paragraph 487 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

497 [sic]. The allegations contained in paragraph 497 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

501. To the extent the allegations contained in paragraph 501 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 501 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 501 that pertains to Anda.

502. To the extent the allegations contained in paragraph 502 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 502 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 502 that pertains to Anda.

503. To the extent the allegations contained in paragraph 503 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 503 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 503 that pertains to Anda.

504. To the extent the allegations contained in paragraph 504 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 505 that pertain to Anda. Further, to the extent that paragraph 504 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are

denied. Anda denies each and every remaining allegation contained in paragraph 504 that pertains to Anda.

505. To the extent the allegations contained in paragraph 505 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 505 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 505 that pertains to Anda.

506. To the extent the allegations contained in paragraph 506 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 506 that pertain to Anda. Further, to the extent that paragraph 506 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 506 that pertains to Anda.

507. To the extent the allegations contained in paragraph 507 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 507 that pertain to Anda. Further, to the extent that paragraph 507 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

508. To the extent the allegations contained in paragraph 508 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 508 that pertain to Anda. Further, to the extent that paragraph 508 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

509. To the extent the allegations contained in paragraph 509 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 509 that pertain to Anda. Further, to the extent that paragraph 509 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

510. To the extent the allegations contained in paragraph 510 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 510 that pertain to Anda. Further, to the extent that paragraph 510 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 510 that pertains to Anda.

511. To the extent the allegations contained in paragraph 511 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 511 that pertain to Anda. Further, to the extent that paragraph 511 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

512. To the extent the allegations contained in paragraph 512 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 512 that pertain to Anda. Further, to the extent that paragraph 512 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are

denied. Anda denies each and every remaining allegation contained in paragraph 512 that pertains to Anda.

513. To the extent the allegations contained in paragraph 513 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 513 that pertain to Anda. Further, to the extent that paragraph 513 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

514. To the extent the allegations contained in paragraph 514 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 514 that pertain to Anda. Further, to the extent that paragraph 514 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 514 that pertains to Anda.

515. To the extent the allegations contained in paragraph 515 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 515 that pertain to Anda. Further, to the extent that paragraph 515 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 515 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 515 that pertains to Anda.

516. To the extent the allegations contained in paragraph 516 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 516 that pertain to Anda. Further, to the extent that paragraph 516 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 516 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 516 that pertains to Anda.

517. To the extent the allegations contained in paragraph 517 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 517 that pertain to Anda. Further, to the extent that paragraph 517 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 517 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 517 that pertains to Anda.

518. To the extent the allegations contained in paragraph 518 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 518 that pertain to Anda. Further, to the extent the allegations contained in paragraph 518 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 518 that pertains to Anda.

519. To the extent the allegations contained in paragraph 519 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 519 that pertain to Anda. Further, to the extent that paragraph 519 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 519 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 519 that pertains to Anda.

520. To the extent the allegations contained in paragraph 520 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 520 that pertains to Anda.

521. The allegations contained in paragraph 521 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda and Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

522. To the extent the allegations contained in paragraph 522 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 522 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that during the time period relevant to this action, it was a member of HDA. Anda denies each and every remaining allegation contained in paragraph 522 that pertains to Anda.

523. To the extent the allegations contained in paragraph 523 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 523 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that during the time period relevant to this action, employees of Anda have attended one or more events where representatives of the DEA discussed the distribution of opioids. Anda denies each and every remaining allegation contained in paragraph 523 that pertains to Anda.

524. To the extent the allegations contained in paragraph 524 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Further, to the extent the allegations contained in paragraph 524 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 524 that pertains to Anda.

525. To the extent the allegations contained in paragraph 525 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 525 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 525 that pertains to Anda.

526. To the extent the allegations contained in paragraph 526 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 526 that pertains to Anda.

527. To the extent the allegations contained in paragraph 527 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 527 that pertain to Anda. Further, to the extent that paragraph 527 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 527 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda,

Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 527 that pertains to Anda.

528. To the extent the allegations contained in paragraph 528 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 528 that pertains to Anda.

529. To the extent the allegations contained in paragraph 529 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 529 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 529 that pertains to Anda.

530. To the extent the allegations contained in paragraph 530 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 530 that pertains to Anda.

531. To the extent the allegations contained in paragraph 531 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 531 that pertains to Anda.

532. The allegations contained in paragraph 532 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

533. The allegations contained in paragraph 533 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 533 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

534. To the extent the allegations contained in paragraph 534 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 534 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 534 that pertains to Anda.

535. To the extent the allegations contained in paragraph 535 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 535 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all

characterizations thereof are denied. Anda admits that during the time period relevant to this action it was a member of HDA. Anda denies each and every remaining allegation contained in paragraph 535 that pertains to Anda.

536. To the extent the allegations contained in paragraph 536 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 536 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 536 that pertains to Anda.

537. The allegations contained in paragraph 537 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 537 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

538. To the extent the allegations contained in paragraph 538 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 538 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 538 that pertains to Anda.

539. To the extent the allegations contained in paragraph 539 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 539 that pertains to Anda.

540. To the extent the allegations contained in paragraph 540 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 540 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that HDA has, during the relevant time period, held conferences, business meetings and other events, some of which were attended by Anda employees. Anda denies each and every remaining allegation contained in paragraph 540 that pertains to Anda.

541. To the extent the allegations contained in paragraph 541 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 541 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that as a member of HDA, it was eligible to participate on councils, committees, task forces and working groups. Anda denies each and every remaining allegation contained in paragraph 541 that pertains to Anda.

542. To the extent the allegations contained in paragraph 542 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 542 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that as a member of HDA, it was eligible to participate in webinars. Anda denies each and every remaining allegation contained in paragraph 542 that pertains to Anda.

543. To the extent the allegations contained in paragraph 543 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 543 that pertains to Anda.

544. To the extent the allegations contained in paragraph 544 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 544 that pertains to Anda.

545. To the extent the allegations contained in paragraph 545 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 545 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all

characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 545 that pertains to Anda.

546. To the extent the allegations contained in paragraph 546 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 546 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 546 that pertains to Anda.

547. [Deleted in CSAC].

548. To the extent the allegations contained in paragraph 548 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 548 that pertains to Anda.

549. To the extent the allegations contained in paragraph 549 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 549 that pertains to Anda.

550. To the extent the allegations contained in paragraph 550 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 550 that pertains to Anda.

551. To the extent the allegations contained in paragraph 551 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 551 that pertain to Anda. Further, to the extent that paragraph 551 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 551 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 551 that pertains to Anda.

552. To the extent the allegations contained in paragraph 552 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 552 that pertains to Anda.

553. To the extent the allegations contained in paragraph 553 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 553 that pertains to Anda.

554. To the extent the allegations contained in paragraph 554 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 554 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 554 that pertains to Anda.

555. To the extent the allegations contained in paragraph 555 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 555 that pertains to Anda.

556. To the extent the allegations contained in paragraph 556 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 556 that pertains to Anda.

557. To the extent the allegations contained in paragraph 557 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 557 that pertains to Anda.

558. To the extent the allegations contained in paragraph 558 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 558 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 558 that pertains to Anda.

559. To the extent the allegations contained in paragraph 559 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it implemented a system to conduct due diligence of each of its customers purchasing controlled substances which includes, but is not limited to, the collection of information through customer questionnaires and dispensing data. Anda expressly denies the characterizations of Anda's practices contained in paragraph 559. Anda denies each and every remaining allegation contained in paragraph 559 that pertains to Anda.

560. To the extent the allegations contained in paragraph 560 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 560 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 560 that pertains to Anda.

561. To the extent the allegations contained in paragraph 561 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 561 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 561 that pertains to Anda.

562. To the extent the allegations contained in paragraph 562 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 562 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 562 that pertains to Anda.

563. To the extent the allegations contained in paragraph 563 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 563 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 563 that pertains to Anda.

564. [Deleted in CSAC].

565. To the extent the allegations contained in paragraph 565 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 565 that pertains to Anda.

566. To the extent the allegations contained in paragraph 566 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda expressly denies that any of the “registrant actions” “orders to show cause” and/or “immediate suspension orders” involved or related to Anda in anyway. Anda denies each and every remaining allegation contained in paragraph 566 that pertains to Anda.

567. To the extent the allegations contained in paragraph 567 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 567 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 567 that pertains to Anda.

568. To the extent the allegations contained in paragraph 568 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 568 that pertains to Anda.

569. To the extent the allegations contained in paragraph 569 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 569 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 569 that pertains to Anda.

570. To the extent the allegations contained in paragraph 570 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 570 that pertains to Anda.

571. To the extent the allegations contained in paragraph 571 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 571 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 571 that pertains to Anda.

572. The allegations contained in paragraph 572 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 572 purport to quote from, summarize

or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

573. The allegations contained in paragraph 573 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 573 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

574. The allegations contained in paragraph 574 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

575. The allegations contained in paragraph 575 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 575 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

576. The allegations contained in paragraph 576 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 576 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

577. The allegations contained in paragraph 577 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

578. The allegations contained in paragraph 578 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

579. To the extent the allegations contained in paragraph 579 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 579 that pertains to Anda.

580. To the extent the allegations contained in paragraph 580 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 580 that pertains to Anda.

581-592. The allegations contained in paragraphs 581-592 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 581-592 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

593. To the extent the allegations contained in paragraph 593 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 593 that pertains to Anda.

594. To the extent the allegations contained in paragraph 594 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 594 that pertains to Anda.

595. To the extent the allegations contained in paragraph 595 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 595 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 595 that pertains to Anda.

596. To the extent the allegations contained in paragraph 596 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 596 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all

characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 596 that pertains to Anda.

597. To the extent the allegations contained in paragraph 597 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 597 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 597 that pertains to Anda.

598. To the extent the allegations contained in paragraph 598 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 598 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 598 that pertains to Anda.

599. To the extent the allegations contained in paragraph 599 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 599 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 596 that pertains to Anda.

600. To the extent the allegations contained in paragraph 600 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 600 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda admits that at all times relevant hereto its conduct was in compliance with the law. Anda denies each and every remaining allegation contained in paragraph 600 that pertains to Anda.

601-605. The allegations contained in paragraphs 601-605 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraphs 601-605 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

606. To the extent the allegations contained in paragraph 606 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 606 that pertains to Anda.

607-659. The allegations contained in paragraphs 607-659 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraphs 607-659 purport to quote from,

summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied.

660-670. The allegations contained in paragraphs 660-670 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

671. To the extent the allegations contained in paragraph 671 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 671 that pertain to Anda. Further, to the extent that paragraph 671 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 671 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 671 that pertains to Anda.

672. To the extent the allegations contained in paragraph 672 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 672 that pertains to Anda.

673-683. The allegations contained in paragraphs 673-683 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

684. To the extent the allegations contained in paragraph 684 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 684 that pertain to Anda. Further, to the extent that paragraph 684 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 684 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 684 that pertains to Anda.

685. To the extent the allegations contained in paragraph 685 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 685 that pertain to Anda. Further, to the extent that paragraph 685 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 685 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 685 that pertains to Anda.

686. To the extent the allegations contained in paragraph 686 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 686 that pertain to Anda. Further, to the extent that paragraph

686 purports to be based on legal opinions, statutes, regulations and/or government publications, those legal opinions, statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Further, to the extent the allegations contained in paragraph 686 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 686 that pertains to Anda.

687. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 687 and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 687 that pertains to Anda.

688. To the extent the allegations contained in paragraph 688 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 688 that pertains to Anda.

689. To the extent the allegations contained in paragraph 689 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent the allegations contained in paragraph 689 purport to quote from, summarize or characterize documents, the documents speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 689 that pertains to Anda.

690. To the extent the allegations contained in paragraph 690 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that the United States Department of Justice was ordered to produce information from its ARCOS database. Answering further, to the extent the allegations contained in paragraph 690 purport to quote from, summarize or characterize the information contained in the ARCOS database production, that production speaks for itself, and all characterizations thereof are denied.

691. To the extent the allegations contained in paragraph 691 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 691 purport to quote from, summarize or characterize the information contained in the ARCOS database production, that production speaks for itself, and all characterizations thereof are denied.

692. To the extent the allegations contained in paragraph 692 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 692 purport to quote from, summarize or characterize the information contained in the ARCOS database production, that production speaks for itself, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 692 that pertains to Anda.

693. To the extent the allegations contained in paragraph 693 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 693 purport to quote from, summarize or characterize the information contained in the ARCOS database production, that production speaks for itself, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 693 that pertains to Anda.

694. To the extent the allegations contained in paragraph 694 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 694 purport to quote from, summarize or characterize the information contained in the ARCOS database production, that production speaks for itself, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 693 that pertains to Anda.

695. To the extent the allegations contained in paragraph 695 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 695 purport to quote from, summarize or characterize the information contained in the ARCOS database production, that production speaks for itself, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 695 that pertains to Anda.

696. To the extent the allegations contained in paragraph 696 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 696 purport to quote

from, summarize or characterize the information contained in the ARCOS database production, that production speaks for itself, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 696 that pertains to Anda.

697. To the extent the allegations contained in paragraph 697 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 696 purport to quote from, summarize or characterize the information contained in the ARCOS database production, other data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 697 that pertains to Anda.

698. To the extent the allegations contained in paragraph 698 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 698 purport to quote from, summarize or characterize the information contained in the ARCOS database production, other data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 698 that pertains to Anda.

699. To the extent the allegations contained in paragraph 699 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 699 purport to quote

from, summarize or characterize the information contained in the ARCOS database production, other data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 699 that pertains to Anda.

700. To the extent the allegations contained in paragraph 700 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 700 purport to quote from, summarize or characterize the information contained in the ARCOS database production, other data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 700 that pertains to Anda.

701. To the extent the allegations contained in paragraph 701 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 701 purport to quote from, summarize or characterize the information contained in the ARCOS database production, other data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 701 that pertains to Anda.

702. To the extent the allegations contained in paragraph 702 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 702 that pertains to Anda.

703. [Deleted in CSAC].

704. [Deleted in CSAC].

705. To the extent the allegations contained in paragraph 705 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 705 that pertains to Anda.

706. The allegations contained in paragraph 706 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

707. The allegations contained in paragraph 707 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

708. To the extent the allegations contained in paragraph 708 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 708 that pertains to Anda.

709. To the extent the allegations contained in paragraph 709 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Answering further, to the extent the allegations contained in paragraph 709 purport to quote from, summarize or characterize the information contained in data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 709 that pertains to Anda.

710. To the extent the allegations contained in paragraph 710 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 710 that pertains to Anda.

711. [Deleted in CSAC].

712. To the extent the allegations contained in paragraph 712 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 712 purport to quote from, summarize or characterize the information contained in documents, those documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 712 that pertains to Anda.

713. To the extent the allegations contained in paragraph 713 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 713 that pertains to Anda.

714. To the extent the allegations contained in paragraph 714 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 714 that pertains to Anda.

715-745. The allegations contained in paragraphs 715-745 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraphs 715-745 purport to quote from, summarize or characterize the information contained in data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied.

746-759. The allegations contained in paragraphs 746-759 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraphs 746-59 purport to quote from, summarize or characterize the information contained in data or documents, those datasets and documents speaks for themselves, and all characterizations thereof are denied.

760. To the extent the allegations contained in paragraph 760 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 760 that pertains to Anda.

761. To the extent the allegations contained in paragraph 761 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 761 that pertains to Anda.

762. To the extent the allegations contained in paragraph 762 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 762 that pertains to Anda.

763. To the extent the allegations contained in paragraph 763 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 763 that pertains to Anda.

764. To the extent the allegations contained in paragraph 764 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 764 that pertains to Anda.

765. To the extent the allegations contained in paragraph 765 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 765 that pertains to Anda.

766. To the extent the allegations contained in paragraph 766 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 766 that pertains to Anda.

767. To the extent the allegations contained in paragraph 767 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 767 that pertains to Anda.

768. To the extent the allegations contained in paragraph 768 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 768 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 768 that pertains to Anda. To the extent the allegations contained in paragraph 768 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 768 that pertains to Anda.

769. To the extent the allegations contained in paragraph 769 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 769 that pertain to Anda. Anda denies each and every

remaining allegation contained in paragraph 769 that pertains to Anda. To the extent the allegations contained in paragraph 769 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 769 that pertains to Anda.

770. To the extent the allegations contained in paragraph 770 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 770 that pertains to Anda.

771. The allegations contained in paragraph 771 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

772. To the extent the allegations contained in paragraph 772 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 772 that pertains to Anda.

773. To the extent the allegations contained in paragraph 773 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 773 that pertains to Anda.

774. The allegations contained in paragraph 774 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

775. To the extent the allegations contained in paragraph 775 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 775 purport to quote from, summarize or characterize the information contained in documents, those documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 775 that pertains to Anda.

776. To the extent the allegations contained in paragraph 776 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 776 that pertains to Anda.

777. To the extent the allegations contained in paragraph 777 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 777 that pertains to Anda.

778. To the extent the allegations contained in paragraph 778 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 778 that pertains to Anda.

779. To the extent the allegations contained in paragraph 779 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 779 that pertains to Anda.

780. To the extent the allegations contained in paragraph 780 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 780 that pertains to Anda.

781. To the extent the allegations contained in paragraph 781 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 781 that pertains to Anda.

782-792. The allegations contained in paragraphs 782-792 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraphs 782-792 purport to quote from, summarize or characterize the information contained in documents or data, those documents and datasets speaks for themselves, and all characterizations thereof are denied.

793. To the extent the allegations contained in paragraph 793 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 793 that pertains to Anda.

794. To the extent the allegations contained in paragraph 794 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 794 purport to quote from, summarize or characterize the information contained in documents, those documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 794 that pertains to Anda.

795. To the extent the allegations contained in paragraph 795 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 795 purport to quote from, summarize or characterize the information contained in documents, those documents speaks for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 795 that pertains to Anda.

796-812. The allegations contained in paragraphs 796-812 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraph 796-812 purport to quote

from, summarize or characterize the information contained in documents, those documents speaks for themselves, and all characterizations thereof are denied.

813. To the extent the allegations contained in paragraph 813 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 813 that pertains to Anda.

II. FACTS PERTAINING TO CLAIMS UNDER RACKETEER-INFLUENCED AND CORRUPT ORGANIZATIONS (“RICO”) ACT

814-877. The allegations contained in paragraphs 814-877 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Answering further, to the extent the allegations contained in paragraphs 814-877 purport to quote from, summarize or characterize the information contained in documents or data, those documents and datasets speak for themselves, and all characterizations thereof are denied.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 *et seq.*—Opioid Marketing Enterprise (Against Purdue, Cephalon, Janssen, Endo, and Mallinckrodt (the “RICO Marketing Defendants”))

878. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-878 of the SAC.

879-905. The allegations contained in paragraphs 879-905 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

SECOND CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 *et seq.*—Opioid Supply Chain Enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen—"RICO Supply Chain Defendants")

906. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-905 of the SAC.

907-938. The allegations contained in paragraphs 907-938 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

THIRD CLAIM FOR RELIEF

Violation Of The Ohio Corrupt Practices Act Ohio Revised Code §§ 2923.31, *et seq.* (Against Purdue, Cephalon, Janssen, Endo, and Mallinckrodt (the "Opioid Marketing Enterprise"))

939. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-938 of the SAC.

940-949. The allegations contained in paragraphs 940-949 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

FOURTH CLAIM FOR RELIEF

Violation Of The Ohio Corrupt Practices Act Ohio Revised Code §§ 2923.31, *et seq.* Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen) (The "Opioid Supply Chain Enterprise")

950. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-949 of the SAC.

951-973. The allegations contained in paragraphs 951-973 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

FIFTH CLAIM FOR RELIEF

Statutory Public Nuisance (Against All Defendants)

974. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-973 of the SAC.

975. To the extent the allegations contained in paragraph 975 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 975 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 975 that pertain to Anda. Further, to the extent that paragraph 975 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 975 that pertains to Anda.

976. To the extent the allegations contained in paragraph 976 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 976 that pertain to Anda. Further, to the extent that paragraph 976 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

977. To the extent the allegations contained in paragraph 977 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such

allegations contained in paragraph 977 that pertain to Anda. Further, to the extent that paragraph 977 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

978. To the extent the allegations contained in paragraph 978 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 978 that pertain to Anda. Further, to the extent that paragraph 978 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

979. To the extent the allegations contained in paragraph 979 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 979 that pertain to Anda. Further, to the extent that paragraph 979 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

980. The allegations contained in paragraph 980 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 980 that pertain to Anda. Further, to the extent that paragraph 980 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

981. The allegations contained in paragraph 981 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 981 that pertain to Anda. Further, to the extent that paragraph 981 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

982. To the extent the allegations contained in paragraph 982 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 982 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 982 that pertain to Anda. Further, to the extent that paragraph 982 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 982 that pertains to Anda.

983. To the extent the allegations contained in paragraph 983 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 983 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 983 that pertain to Anda. Further, to the extent that paragraph 983 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 983 that pertains to Anda.

984. To the extent the allegations contained in paragraph 984 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 984 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations

contained in paragraph 984 that pertain to Anda. Further, to the extent that paragraph 984 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 984 that pertains to Anda.

985. To the extent the allegations contained in paragraph 985 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 985 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 985 that pertain to Anda. Further, to the extent that paragraph 985 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 985 that pertains to Anda.

986. To the extent the allegations contained in paragraph 986 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 986 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 986 that pertain to Anda. Further, to the extent that paragraph 986 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 986 that pertains to Anda.

987. To the extent the allegations contained in paragraph 987 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 987 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 987 that pertain to Anda. Further, to the extent that paragraph 987 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 987 that pertains to Anda.

988. To the extent the allegations contained in paragraph 988 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 988 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 988 that pertain to Anda. Further, to the extent that paragraph 988 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 988 that pertains to Anda.

989. To the extent the allegations contained in paragraph 989 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it had control over its own conduct in Plaintiffs' communities including control over its own shipments of opioids, their reporting activity and its anti-diversion policies

and procedures. Anda denies each and every remaining allegation contained in paragraph 989 that pertains to Anda.

990. To the extent the allegations contained in paragraph 990 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 990 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 990 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 990 that pertains to Anda.

991. To the extent the allegations contained in paragraph 991 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 991 that pertains to Anda.

992. To the extent the allegations contained in paragraph 992 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 992 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 992 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 992 that pertains to Anda.

993. The allegations contained in paragraph 993 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

994. To the extent the allegations contained in paragraph 994 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 994 that pertains to Anda.

995. The allegations contained in paragraph 995 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 995 that pertain to Anda.

996. The allegations contained in paragraph 996 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 996 that pertain to Anda.

SIXTH CLAIM FOR RELIEF

Common Law Absolute Public Nuisance (Against All Defendants)

997. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-996 of the SAC.

998. The allegations contained in paragraph 998 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 998 that pertain to Anda.

999. The allegations contained in paragraph 999 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 999 that pertain to Anda.

1000. To the extent the allegations contained in paragraph 1000 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1000 that pertains to Anda.

1001. To the extent the allegations contained in paragraph 1001 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1001 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1001 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1001 that pertains to Anda.

1002. To the extent the allegations contained in paragraph 1002 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1002 that pertains to Anda.

1003. To the extent the allegations contained in paragraph 1003 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1003 that pertains to Anda.

1004. To the extent the allegations contained in paragraph 1004 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent that paragraph 1004 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1004 that pertains to Anda.

1005. To the extent the allegations contained in paragraph 1005 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Further, to the extent that paragraph 1005 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1005 that pertains to Anda.

1006. To the extent the allegations contained in paragraph 1006 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1006 that pertains to Anda.

1007. To the extent the allegations contained in paragraph 1007 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1007 that pertains to Anda.

1008. To the extent the allegations contained in paragraph 1008 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1008 that pertains to Anda.

1009. The allegations contained in paragraph 1009 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1009 that pertain to Anda. Further, to the extent that paragraph 1009 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

1010. To the extent the allegations contained in paragraph 1010 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1010 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1010 that pertain to Anda. Further, to the extent that paragraph 1010 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1010 that pertains to Anda.

1011. To the extent the allegations contained in paragraph 1011 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1011 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1011 that pertain to Anda. Further, to the extent that paragraph 1011 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1011 that pertains to Anda.

1012. To the extent the allegations contained in paragraph 1012 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1012 that pertains to Anda.

1013. The allegations contained in paragraph 1013 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1014. The allegations contained in paragraph 1014 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1015. The allegations contained in paragraph 1015 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1016. To the extent the allegations contained in paragraph 1016 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1016 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1016 that pertain to Anda. Further, to the extent that paragraph 1016 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1016 that pertains to Anda.

1017. To the extent the allegations contained in paragraph 1017 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it is in the business of distributing prescription drugs, including opioids many of which have been determined to be substances posing a high potential for abuse and addiction. Anda denies each and every remaining allegation contained in paragraph 1017 that pertains to Anda.

1018. To the extent the allegations contained in paragraph 1018 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1018 that pertains to Anda.

1019. To the extent the allegations contained in paragraph 1019 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it had control over its own conduct in Plaintiffs' communities including control over its own shipments of opioids, their reporting activity and its anti-diversion policies and procedures. Anda denies each and every remaining allegation contained in paragraph 1019 that pertains to Anda.

1020. To the extent the allegations contained in paragraph 1020 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1020 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1020 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1020 that pertains to Anda.

1021. To the extent the allegations contained in paragraph 1021 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1021 that pertains to Anda.

1022. To the extent the allegations contained in paragraph 1022 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1022 that pertains to Anda.

1023. To the extent the allegations contained in paragraph 1023 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1023 that pertains to Anda.

1024. To the extent the allegations contained in paragraph 1024 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1024 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1024 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1024 that pertains to Anda.

1025. To the extent the allegations contained in paragraph 1025 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1025 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1025 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1025 that pertains to Anda.

1026. To the extent the allegations contained in paragraph 1026 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1026 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1026 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1026 that pertains to Anda.

1027. To the extent the allegations contained in paragraph 1027 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1027 that pertains to Anda.

1028. To the extent the allegations contained in paragraph 1028 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1028 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1028 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1028 that pertains to Anda.

1029. The allegations contained in paragraph 1029 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1030. To the extent the allegations contained in paragraph 1030 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1030 that pertains to Anda.

1031. To the extent the allegations contained in paragraph 1031 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1031 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1031 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1031 that pertains to Anda.

1032. The allegations contained in paragraph 1032 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1032 that pertain to Anda.

1033. To the extent the allegations contained in paragraph 1033 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1033 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1033 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1033 that pertains to Anda.

1034. To the extent the allegations contained in paragraph 1034 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1034 that pertains to Anda.

1035. To the extent the allegations contained in paragraph 1035 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1035 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1035 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1035 that pertains to Anda.

1036. To the extent the allegations contained in paragraph 1036 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1036 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1036 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1036 that pertains to Anda.

1037. To the extent the allegations contained in paragraph 1037 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1037 consist of legal conclusions no

response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1037 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1037 that pertains to Anda.

1038. The allegations contained in paragraph 1038 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1038 that pertain to Anda.

SEVENTH CLAIM FOR RELIEF

Negligence (Against All Defendants)

1039. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1038 of the SAC.

1040. The allegations contained in paragraph 1040 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1040 that pertain to Anda.

1041. The allegations contained in paragraph 1041 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1041 that pertain to Anda.

1042. The allegations contained in paragraph 1042 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1042 that pertain to Anda. Further, to the extent that paragraph 1042 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

1043. To the extent the allegations contained in paragraph 1043 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1043 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1043 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1043 that pertains to Anda.

1044. To the extent the allegations contained in paragraph 1044 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1044 that pertains to Anda.

1045. To the extent the allegations contained in paragraph 1045 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1045 that pertains to Anda.

1046. The allegations contained in paragraph 1046 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1047. To the extent the allegations contained in paragraph 1047 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1047 that pertains to Anda.

1048. To the extent the allegations contained in paragraph 1048 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1048 that pertains to Anda.

1049. To the extent the allegations contained in paragraph 1049 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1049 that pertains to Anda.

1050. To the extent the allegations contained in paragraph 1050 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1050 that pertains to Anda.

1051. To the extent the allegations contained in paragraph 1051 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1051 that pertains to Anda.

1052. To the extent the allegations contained in paragraph 1052 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1052 that pertains to Anda.

1053. To the extent the allegations contained in paragraph 1053 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it had control over its own conduct in Plaintiffs' communities including control over its own shipments of opioids, their reporting activity and its anti-diversion policies and procedures. Anda denies each and every remaining allegation contained in paragraph 1053 that pertains to Anda.

1054. To the extent the allegations contained in paragraph 1054 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1054 that pertains to Anda.

1055. To the extent the allegations contained in paragraph 1055 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1055 that pertains to Anda.

1056. To the extent the allegations contained in paragraph 1056 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda admits that it is in the business of distribution prescription drugs, including opioids

some of which are substances which may pose a high potential for abuse and addiction. Anda denies each and every remaining allegation contained in paragraph 1056 that pertains to Anda.

1057. To the extent the allegations contained in paragraph 1057 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1057 that pertains to Anda.

1058. To the extent the allegations contained in paragraph 1058 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1058 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1058 that pertain to Anda. Further, to the extent that paragraph 1058 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1058 that pertains to Anda.

1059. To the extent the allegations contained in paragraph 1059 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1059 that pertains to Anda.

1060. To the extent the allegations contained in paragraph 1060 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1060 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1060 that pertain to Anda. Further, to the extent that paragraph 1060 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1060 that pertains to Anda.

1061. To the extent the allegations contained in paragraph 1061 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1061 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1061 that pertain to Anda. Further, to the extent that paragraph 1061 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1061 that pertains to Anda.

1062. To the extent the allegations contained in paragraph 1062 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1062 that pertains to Anda.

1063. To the extent the allegations contained in paragraph 1063 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1063 that pertains to Anda.

1064. To the extent the allegations contained in paragraph 1064 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1064 consist of legal conclusions no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1064 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1064 that pertains to Anda.

1065. To the extent the allegations contained in paragraph 1065 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1065 that pertains to Anda.

1066. To the extent the allegations contained in paragraph 1066 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1066 that pertains to Anda.

1067. The allegations contained in paragraph 1067 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1068. To the extent the allegations contained in paragraph 1068 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1068 that pertains to Anda.

1069. To the extent the allegations contained in paragraph 1069 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1069 that pertains to Anda.

1070. To the extent the allegations contained in paragraph 1070 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1070 that pertains to Anda.

1071. The allegations contained in paragraph 1071 consist of a summary of Plaintiffs' claims to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1071 that pertain to Anda.

EIGHTH CLAIM FOR RELIEF

Common Law Fraud¹ (Against the Marketing Defendants)

1072. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1071 of the SAC.

1073-1089. The allegations contained in paragraphs 1073-1089 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

NINTH CLAIM FOR RELIEF

Injury Through Criminal Acts (R.C. 2307.60) (Against All Defendants)

1090. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1089 of the SAC.

1091. The allegations contained in paragraph 1091 consist of legal conclusions to which no response is required. To the extent a response is required, Anda denies all such allegations contained in paragraph 1091 that pertain to Anda. Further, to the extent that paragraph 1091 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied.

1092. To the extent the allegations contained in paragraph 1092 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge

¹ Plaintiffs in this action do not assert any claim for spending on prescription opioids by their health plans, workers compensation, or other programs. Cuyahoga County, whose action is also a “Track One” case under Case Management Order One, *In re: National Prescription Opiate Litig.*, Case No. 1:17-MD-2804 (DAP), Doc. 232 (N.D. Ohio Apr. 11, 2018), however, does include such spending as part of the damages or restitution it seeks.

or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1092 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1092 that pertain to Anda. Further, to the extent that paragraph 1092 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1092 that pertains to Anda.

1093. To the extent the allegations contained in paragraph 1093 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1093 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1093 that pertain to Anda. Further, to the extent that paragraph 1093 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1093 that pertains to Anda.

1094. To the extent the allegations contained in paragraph 1094 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1094 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations

contained in paragraph 1094 that pertain to Anda. Further, to the extent that paragraph 1094 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1094 that pertains to Anda.

1095. To the extent the allegations contained in paragraph 1095 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1095 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1095 that pertain to Anda. Further, to the extent that paragraph 1095 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1095 that pertains to Anda.

1096. To the extent the allegations contained in paragraph 1096 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1096 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1096 that pertain to Anda. Further, to the extent that paragraph 1096 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are

denied. Anda denies each and every remaining allegation contained in paragraph 1096 that pertains to Anda.

1097. To the extent the allegations contained in paragraph 1097 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1097 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1097 that pertain to Anda. Further, to the extent that paragraph 1097 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1097 that pertains to Anda.

1098. To the extent the allegations contained in paragraph 1098 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1098 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1098 that pertain to Anda. Further, to the extent that paragraph 1098 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1098 that pertains to Anda.

1099. To the extent the allegations contained in paragraph 1099 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1099 that pertains to Anda.

1100. To the extent the allegations contained in paragraph 1100 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1100 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1100 that pertain to Anda. Anda denies each and every remaining allegation contained in paragraph 1100 that pertains to Anda.

1101. To the extent the allegations contained in paragraph 1101 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1101 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1101 that pertain to Anda. Further, to the extent that paragraph 1101 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1101 that pertains to Anda.

1102. The allegations contained in paragraph 1102 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1103. To the extent the allegations contained in paragraph 1103 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1103 that pertains to Anda.

1104. To the extent the allegations contained in paragraph 1104 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1104 that pertains to Anda.

1105. The allegations contained in paragraph 1105 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1106. To the extent the allegations contained in paragraph 1106 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1106 that pertains to Anda.

1107. The allegations contained in paragraph 1107 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1107 that pertain to Anda.

TENTH CLAIM FOR RELIEF

Unjust Enrichment (Against All Defendants)

1108. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1107 of the SAC.

1109. To the extent the allegations contained in paragraph 1109 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1109 that pertains to Anda.

1110. The allegations contained in paragraph 1110 consist of legal conclusions to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1110 that pertain to Anda.

1111. To the extent the allegations contained in paragraph 1111 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1111 consist of legal conclusions no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1111 that pertain to Anda. Further, to the extent that paragraph 1111 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are

denied. Anda denies each and every remaining allegation contained in paragraph 1111 that pertains to Anda.

1112. Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1112 and, therefore, denies them.

1113. To the extent the allegations contained in paragraph 1113 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1113 that pertains to Anda.

1114. To the extent the allegations contained in paragraph 1114 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1114 that pertains to Anda.

1115. To the extent the allegations contained in paragraph 1115 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1115 that pertains to Anda.

1116. To the extent the allegations contained in paragraph 1116 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. To the extent the allegations contained in paragraph 1116 consist of legal conclusions no

response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1116 that pertain to Anda. Further, to the extent that paragraph 1116 purports to be based on statutes, regulations and/or government publications, those statutes, regulations, and/or publications speak for themselves, and all characterizations thereof are denied. Anda denies each and every remaining allegation contained in paragraph 1116 that pertains to Anda.

1117. To the extent the allegations contained in paragraph 1117 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1117 that pertains to Anda.

1118. To the extent the allegations contained in paragraph 1118 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1118 that pertains to Anda.

1119. To the extent the allegations contained in paragraph 1119 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1119 that pertains to Anda.

1120. The allegations contained in paragraph 1120 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1121. The allegations contained in paragraph 1121 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1121 that pertain to Anda.

ELEVENTH CLAIM FOR RELIEF

Civil Conspiracy (Against All Defendants)

1122. Anda realleges and incorporates by reference its responses to the allegations contained in paragraphs 1-1121 of the SAC.

1123. To the extent the allegations contained in paragraph 1123 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1123 that pertains to Anda.

1124. To the extent the allegations contained in paragraph 1124 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1124 that pertains to Anda.

1125. To the extent the allegations contained in paragraph 1125 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1125 that pertains to Anda.

1126. The contained in paragraph 1126 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1127. To the extent the allegations contained in paragraph 1127 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1127 that pertains to Anda.

1128. To the extent the allegations contained in paragraph 1128 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1128 that pertains to Anda.

1129. To the extent the allegations contained in paragraph 1129 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1129 that pertains to Anda.

1130. To the extent the allegations contained in paragraph 1130 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies

them. Anda denies each and every remaining allegation contained in paragraph 1130 that pertains to Anda.

1131. To the extent the allegations contained in paragraph 1131 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1131 that pertains to Anda.

1132. To the extent the allegations contained in paragraph 1132 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 11232 that pertains to Anda.

1133. To the extent the allegations contained in paragraph 1133 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1133 that pertains to Anda.

1134. To the extent the allegations contained in paragraph 1134 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them. Anda denies each and every remaining allegation contained in paragraph 1134 that pertains to Anda.

1135. The allegations contained in paragraph 1135 refer to the knowledge, conduct, or actions of persons, entities, or Defendants other than Anda, Anda is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

1136. The allegations contained in paragraph 1136 consist of a summary of Plaintiffs' claims to which no response is required. To the extent is a response is required, Anda denies all such allegations contained in paragraph 1136 that pertain to Anda.

AFFIRMATIVE DEFENSES

Pursuant to Fed. R. Civ. P. 8(c), Anda hereby set forth the following affirmative defenses and reserve the right to raise additional affirmative defenses based on information learned through discovery.

In asserting these affirmative defenses, Anda does not assume the burden to establish any fact or proposition where that burden is properly imposed on Plaintiffs. The affirmative defenses that follow are pled in the alternative and none should be construed as an admission of liability by Anda or that Plaintiffs are entitled to relief.

First Affirmative Defense

The SACs fail to state a claim upon which relief can be granted.

Second Affirmative Defense

This Court lacks subject matter jurisdiction over all or some of the claims asserted by Plaintiffs.

Third Affirmative Defense

Some or all of Plaintiffs' claims are preempted by federal law, insofar as they conflict with Congress' purposes and objectives in enacting relevant federal legislation and authorizing regulations.

Fourth Affirmative Defense

The Court lacks subject matter jurisdiction based on the failure to exhaust administrative remedies.

Fifth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by the political question and separation of powers doctrines.

Sixth Affirmative Defense

Plaintiffs lack standing to assert all or some of their claims in this lawsuit.

Seventh Affirmative Defense

Plaintiffs have failed to plead that any specific prescription for an opioid written and dispensed in the relevant jurisdictions, and which Plaintiffs claim caused them harm, was distributed into the relevant jurisdictions by Anda.

Eighth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because the harm alleged was proximately caused by the negligence, gross negligence, or criminal, and/or intentional and malicious acts of intervening third parties not under the control of Anda.

Ninth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by contributory negligence.

Tenth Affirmative Defense

Plaintiffs' claims are barred because Plaintiffs failed to join one or more indispensable parties, including but not limited to the DEA, and healthcare providers, prescribers, patients, and other third parties whom Plaintiffs allege engaged in the prescription, dispensing, diversion or use of the opioids at issue.

Eleventh Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, because they have suffered no damages as a result of the matters alleged in the SACs.

Twelfth Affirmative Defense

Recovery from Anda is barred, in whole or in part, by the free public services doctrine.

Thirteenth Affirmative Defense

Plaintiffs' claims against Anda are barred because Anda has complied with all applicable federal, state and local statutes, regulations and rules related to the distribution of opioids.

Fourteenth Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, by the applicable statutes of limitations and repose.

Fifteenth Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, by the doctrines of laches, estoppel, and waiver.

Sixteenth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because they violate the *Ex Post Facto* clauses of Article I of the United States Constitution, insofar as Plaintiffs seek to impose liability retroactively for conduct that was not actionable at the time it occurred.

Seventeenth Affirmative Defense

Any and all of the injuries or damages suffered by Plaintiffs resulted solely from conduct and/or conditions for which Anda is not responsible and for which it cannot be held liable.

Eighteenth Affirmative Defense

Any and all of the injuries or damages allegedly suffered by Plaintiffs resulted solely from the acts of others for whom Anda may not be held liable.

Nineteenth Affirmative Defense

Plaintiffs' claims against Anda are misjoined with Plaintiffs' claims against other defendants and must be severed.

Twentieth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by Plaintiffs' failure to mitigate damages.

Twenty-first Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because the claims are speculative and remote; and because of the impossibility of ascertaining and allocating the alleged damages.

Twenty-second Affirmative Defense

To the extent that Plaintiffs seek equitable relief against Anda, Plaintiffs are not entitled to such relief because Plaintiffs have an adequate remedy at law.

Twenty-third Affirmative Defense

Plaintiffs' claims for unjust enrichment are barred because Anda has not accepted or retained any benefits under circumstances where it would be inequitable for Anda to do so.

Twenty-fourth Affirmative Defense

Plaintiffs' claims for unjust enrichment are barred because Plaintiffs have no authority to bring such claims on behalf of itself or the citizens of its respective jurisdiction.

Twenty-fifth Affirmative Defense

Plaintiffs' claims for unjust enrichment are barred because Plaintiffs did not pay Anda any of the amounts sought.

Twenty-sixth Affirmative Defense

Plaintiffs have not suffered, and will not suffer, any injury to a legally protected or cognizable interest by reason of Anda's conduct as alleged in the SACs.

Twenty-seventh Affirmative Defense

Plaintiffs lack capacity to bring their claims, including claims indirectly maintained on behalf of their citizens and claims brought as *parens patriae*.

Twenty-eighth Affirmative Defense

Plaintiffs' claims for injunctive relief are barred because they are punitive in nature.

Twenty-ninth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by the Due Process Clause of the Fifth and Fourteenth Amendments to the United States Constitution because substantive due process forbids the retroactive imposition of changing and unclear legal interpretations of the Controlled Substances Act.

Thirtieth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because Anda is specifically licensed by the DEA and each of the fifty (50) states to distribute the controlled substances referred to in the SACs to certain licensed purchasers within the respective jurisdiction.

Thirty-first Affirmative Defense

Plaintiffs' commencement and prosecution of this action is arbitrary and capricious, and its claims are contrary to the Controlled Substances Act, and rules and regulations promulgated pursuant to that Act.

Thirty-second Affirmative Defense

Plaintiffs lack authority to bring their claims under the Controlled Substances Act.

Thirty-third Affirmative Defense

Plaintiffs lack authority to bring their claims because Plaintiffs are not authorized to pursue common law claims on behalf of residents or citizens of their respective jurisdictions.

Thirty-fourth Affirmative Defense

The SACs fail to state a claim against Anda because Plaintiffs cannot establish a right common to the general public with which Anda unreasonably interfered.

Thirty-fifth Affirmative Defense

Anda adopts by reference all defenses asserted in any party's motion to dismiss filed in this MDL.

Thirty-sixth Affirmative Defense

An award of punitive damages would be in violation of Anda's rights to procedural due process under the Fourteenth Amendment of the United States Constitution.

Thirty-seventh Affirmative Defense

To the extent Plaintiffs assert a claim for punitive damages against Anda by virtue of the matters set forth in the SACs, Plaintiffs are not entitled to any punitive damages because the alleged conduct of Anda cannot be determined in any manner to have been in willful, wanton or reckless disregard of the rights of Plaintiffs.

Thirty-eighth Affirmative Defense

An award of punitive damages would violate Anda's right to protection from excessive fines as provided in the Eighth Amendment of the United States Constitution and violate Anda's rights to substantive due process as provided in the Fifth and Fourteenth Amendments of the United States Constitution.

Thirty-ninth Affirmative Defense

To the extent Plaintiffs assert a claim for punitive damages against Anda, punitive damages may not be assessed against any Defendant for the conduct of another Defendant or entity.

Fortieth Affirmative Defense

Plaintiffs' claim for punitive damages violates, and is therefore barred by, the provisions of the Constitution of the United States upon the following grounds:

- a. It is a violation of the due process and equal protection clauses to impose punitive damages against a civil defendant upon the Plaintiffs' satisfaction of a burden of proof less than the burden of proof that is required in criminal cases.
- b. The procedures under which punitive damages may be awarded fail to provide a reasonable or substantive limit on the amount of the award which may be levied against Anda.
- c. The procedures under which punitive damages may be awarded fail to provide specific standards for the amount of the award against Anda.
- d. The procedures under which punitive damages may be awarded result in the imposition of differing penalties for the same or similar acts.
- e. The procedures under which punitive damages may be awarded permit the imposition of such damages in excess of the maximum possible criminal fines for the same or similar acts.

Forty-first Affirmative Defense

Anda affirmatively states that it maintains thorough procedures for shipping prescription medications into the relevant jurisdiction.

Forty-second Affirmative Defense

Plaintiffs' claims are barred by the doctrine of primary jurisdiction.

Forty-third Affirmative Defense

Anda's rights under the Due Process Clause of the U.S. Constitution are violated by any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, financial or otherwise, in the context of a civil enforcement proceeding. *See, e.g., Marshall v. Jerrico, Inc.*, 446 U.S. 238 (1980).

Forty-fourth Affirmative Defense

Plaintiffs' claims are barred by the learned intermediary doctrine.

Forty-fifth Affirmative Defense

To the extent Plaintiffs are alleging fraud, fraudulent concealment, or similar conduct, Plaintiffs have failed to plead the allegations with sufficient particularity.

Forty-sixth Affirmative Defense

Plaintiffs fail to plead any actionable misrepresentation or omission made by or attributable to Anda.

Forty-seventh Affirmative Defense

Plaintiffs are precluded from recovering against Anda pursuant to applicable law following section 402A of the Restatement (Second) of Torts.

Forty-eighth Affirmative Defense

Plaintiffs' recovery is barred under Section 6(c) of the Restatement of Torts (Third).

Forty-ninth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have no private right of action under the relevant laws and regulations.

Fiftieth Affirmative Defense

Anda did not owe or breach any statutory or common law duty to Plaintiffs.

Fifty-first Affirmative Defense

Plaintiffs' claims and damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers by a municipality.

Fifty-second Affirmative Defense

Plaintiffs are barred from recovery by application of the informed consent doctrine.

Fifty-third Affirmative Defense

Plaintiffs' claims are barred to the extent they are based on alleged violations of industry customs because purported industry customers do not impose legal duties on Anda.

Fifty-fourth Affirmative Defense

Plaintiffs' claims are barred by the assumption of risk doctrine.

Fifty-fifth Affirmative Defense

Plaintiffs' claims are barred in whole or in part, or are subject to other limitations, by the Ohio Product Liability Act, Ohio Revised Code § 2307.71, *et seq.*

Fifty-sixth Affirmative Defense

Plaintiffs lack the statutory authority to bring a nuisance claim under Ohio law.

Fifty-seventh Affirmative Defense

Plaintiffs' claim for public nuisance is barred or limited because Anda's conduct, as alleged in the SACs, did not involve interference with real property.

Fifty-eighth Affirmative Defense

Plaintiffs' claim for public nuisance is barred or limited because illegal conduct by third parties involve the use of an otherwise legal product does not involve a public right upon which to base a claim for public nuisance.

Fifty-ninth Affirmative Defense

Anda is not liable for any statements made by any other Defendant.

Sixtieth Affirmative Defense

Plaintiffs' claims are barred to the extent that opioid products at issue were misused, modified, altered or changed from the condition in which they were sold, which misuse, modification, alteration or change caused or contributed to Plaintiffs' alleged injuries or damages.

Sixty-first Affirmative Defense

Anda is not liable for any injuries or expenses allegedly incurred by Plaintiffs to the extent the injuries or expenses as alleged may have resulted from the pre-existing and/or unrelated medical conditions of the users of the opioid products at issue.

Sixty-second Affirmative Defense

Any injuries and/or damages sustained by Plaintiffs were caused, in whole or in part, by their own failure to effectively enforce the law and prosecute violations thereof and any recovery by Plaintiffs is barred or, alternatively, should be diminished according to their own fault.

Sixty-third Affirmative Defense

Plaintiffs may not recover against Anda because the methods, standards, or techniques for distributing opioid products complied with and were in conformity with the generally recognized state of the art at the time the product was distributed.

Sixty-fourth Affirmative Defense

To the extent that Plaintiffs rely on letters or other informal guidance from the DEA to establish Anda's regulatory duties, such informal guidance cannot enlarge Anda's regulatory duties in the absence of compliance by DEA with the requirements of the Administrative Procedures Act, 5 U.S.C. § 551 *et seq.*

Sixty-fifth Affirmative Defense

Plaintiffs' claims are barred, in whole or in part, by the economic loss doctrine.

Sixty-sixth Affirmative Defense

Plaintiffs' claims against Anda are barred, in whole or in part, to the extent they rely, explicitly or implicitly, on a theory of market-share liability.

Sixty-seventh Affirmative Defense

Plaintiffs' claims against Anda are barred, reduced and/or limited pursuant to the applicable Ohio statutory and common laws regarding limitations of awards, caps on recovery and setoffs.

Sixty-eighth Affirmative Defense

Should Anda be held liable to Plaintiffs, which liability is specifically denied, Anda would we be entitled to a credit or set-off for all sums of money received or available from or on behalf of any tortfeasor(s) for the same injuries alleged in the SACs.

Sixty-ninth Affirmative Defense

Plaintiffs' claims are barred and/or reduced by contributory or comparative negligence and contributory or comparative fault.

Seventieth Affirmative Defense

Anda will request apportionment of fault pursuant to Ohio Revised Code § 2307.23 of all parties who may be jointly and severally liable for all or part of Plaintiffs' alleged injuries, losses or damages.

Seventy-first Affirmative Defense

Any damages to which Plaintiffs may be entitled to recover from Anda (which Anda specifically denies) are capped pursuant to Ohio Revised Code §§ 2315.18 and 2315.21.

Seventy-second Affirmative Defense

Plaintiffs' claims are barred in whole or in part by the Dormant Commerce Clause of the United States Constitution.

Seventy-third Affirmative Defense

Anda is entitled to, and claims the benefit of, all defenses and presumptions set forth in or arising from any rule of law or statute of this State or any other state whose substantive law might control the action.

Seventy-fourth Affirmative Defense

Plaintiffs' claims are subject to all defenses that could be asserted if Plaintiffs' claims were properly made by individuals on whose behalf or for whose alleged damages Plaintiffs seek to recover.

Seventy-fifth Affirmative Defense

Anda adopts by reference any additional applicable defense pled by any other Defendants not otherwise pled herein. Anda hereby gives notice that it intends to rely upon any other and additional defense that is now or may become available or appear during or as a result of the

discovery proceedings in this action and hereby reserves its right to amend its answer to assert such defense.

WHEREFORE, Anda denies that Plaintiffs are entitled to any relief whatsoever. Anda further request that this Court enter judgment in Anda's favor and against Plaintiffs as follows:

- a. That Plaintiffs take nothing by reason of their Corrected Second Amended Complaint and that judgment be rendered in favor of Anda;
- b. For such other relief as this Court deems just and proper.

JURY DEMAND

Anda hereby demands trial by jury as to all issues so triable.

Dated: January 15, 2019

Respectfully submitted,

/s/ James W. Matthews

James W. Matthews (*pro hac vice*)
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Counsel for Defendant Anda, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January 2019, the foregoing was served on all counsel of record via the Court's electronic filing system.

/s/ James W. Matthews
James W. Matthews